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**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

Re: *Petition of UNE-P Coalition to Open*)
Contested Case Proceeding to Declare)
Unbundled Switching an Unrestricted)
Unbundled Network Element)

OFFICE OF THE
EXECUTIVE SECRETARY
Docket No. 02-00207

**UNE-P COALITION FIRST DATA REQUEST TO
TIME WARNER TELECOM OF THE MID-SOUTH, L.P.**

The UNE-P Coalition serves upon Time Warner Telecom of the Mid-South, L.P.
("Time Warner") the following written interrogatories to be answered under oath by an officer
or agent of Time Warner on or before June 13, 2002.

INSTRUCTIONS FOR USE AND DEFINITIONS

1. All information is to be divulged which is in the possession of Time Warner, its attorneys, investigators, agents, employees, or other representatives of Time Warner and/or its attorneys.
2. Where an Interrogatory calls for an answer that involves more than one part, each part of the answer should be clearly set out so it is understandable.
3. In the event the space provided on the form of Interrogatories is not sufficient for your answer to any of the Interrogatories, please attach a labeled, separate sheet of paper with the additional information.
4. These Interrogatories are intended as continuing Interrogatories, requiring you to supplement your answer, setting forth any information within the scope of the Interrogatories that may be acquired by you, your agents, your attorneys, or representatives at any time following the date of your original answer.

5. "State all facts" or "state the factual basis" means to set forth in writing and in detail every fact, opinion, assumption, belief, hypothesis, and theory, concerning or relating to the matter inquired about in the Interrogatory, whether these are matters of your own observation and actual knowledge, or are matters which you have become aware of through some other means or through some other person. It furthermore means to set forth in writing in detail how and when you came to observe or have actual knowledge of the matter and how and when you became aware of the matter through some other means or person. It also means to identify all such persons through whom you became aware of the matters.

6. When used with reference to natural persons, the word "identify" or "identity" or the phrase "give the identity of" means to state his or her full name, present or last-known address, present or last-known employer, present or last-known telephone number, occupation or profession, and the capacity in which he or she has ever been affiliated with Time Warner.

7. When used with reference to a document, the word "identify" or "identity" or the phrase "give the identity of" means to state the type of document to which the Interrogatory is addressed (i.e., correspondence, memoranda, notes, etc.); its title or other means of identification; its author's identity; its date; the identity of all recipients of the document (whether the document is addressed to such recipient or merely copied to such recipient); all dates and places of recording or filing with any court, commission, or public agency; the book and page number, or cause number, and all other information reflecting recordation or filing; the present location and identity of the custodian of the original document; the present location and identity of all the persons having a copy of such document; and whether such original or copy of the document is presently in your possession or control, and, if it is not, what disposition was made of it. In the alternative, the document(s) in question may be

attached to the answer to that particular Interrogatory.

8. "Documents" is to be construed in the broadest possible sense and means any tangible thing, recording and reproduction, whether visual, auditory or digital in Time Warner's possession, control, or custody, including without limiting the generality of its meaning, correspondence, pleadings, reports, depositions, personal memoranda, memoranda to files, inter-office memoranda, intra-office memoranda, drawings, prints, graphs, charts, photographs, phonographs, notes, studies, valuations, analyses, reports (whether expert or otherwise), reviews, working papers, books, notes, telegrams, pamphlets, video or audio tapes, voice recordings, computer tapes, printouts or cards, microfilms, microfiches, and any papers or items on which words have been written, printed, typed, or otherwise affixed, and shall mean a copy when the original is not in the possession, control, or custody of Time Warner, and shall mean every copy of every document when such a copy is not an identical copy of an original.
9. "Person" shall mean and is defined as any natural person, proprietorship, association, partnership, corporation or any business entity, to include in the singular as well as the plural.
10. "You" or "yours" means Time Warner and any agents or employees thereof.

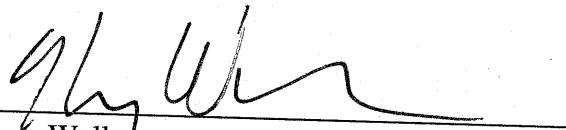
REQUESTS FOR INFORMATION

1. Please state (a) the number of operational local circuit switches (5Es or the equivalent) that Time Warner has deployed in Tennessee; (b) where those switches are located; (c) how long they have been in operation; and (d) how many customers are served by each of them.
2. Please identify each BellSouth central office in Tennessee (by switch CLLI Code and name) in which Time Warner has collocated facilities.
3. Please state, for each of the collocation facilities identified above, the number of Time Warner business customers to whom Time Warner provisions service using (a)

unbundled analog loops; (b) unbundled DS-1 loops; (c) unbundled DS-3 loops; (d) DS-1 special access; (e) DS-3 special access; and (f) non-BellSouth provided fiber or other loop facilities.

4. Please provide the traffic exchanged between BellSouth and Time Warner in 2001, split between MOUs originating with Time Warner subscribers and terminating with BellSouth, and MOUs originating with BellSouth subscribers and terminating with Time Warner.
5. Please provide (a) the total number of lines connected to Time Warner's switch(es) in Tennessee; and (b) the number of those lines used to serve providers of Internet access service.
6. Please provide all documents relating to any profitability analysis conducted by Time Warner concerning service provided to business customers with 24 or fewer lines.
7. Please provide copies of all documents prepared by Time Warner related to hot cuts and loop provisioning, including without limitation time-and-motion studies and similar analyses.
8. Please state how many residential customers (other than Time Warner employees or their families) Time Warner serves in Tennessee.
9. Please provide all documents related to any prohibition or restriction on Time Warner's ability to provide service to residential customers.

Respectfully submitted,



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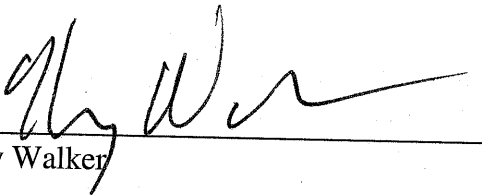
Counsel for the UNE-P Coalition

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to the following on this the 24th day of May, 2002.

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
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Charles B. Welch, Esq.
Farris, Mathews, et al.
618 Church Street
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Nashville, TN 37219


Henry Walker